

1 RENE L. VALLADARES  
Federal Public Defender  
2 Nevada State Bar No. 11479  
ADEN KAHSSAI  
3 Assistant Federal Public Defender  
Nevada State Bar No. 15581  
4 411 E. Bonneville, Ste. 250  
Las Vegas, Nevada 89101  
5 (702) 388-6577/Phone  
(702) 388-6261/Fax  
6 Aden\_Kahssai@fd.org

7 Attorney for Leonard James Shove

8  
9 **UNITED STATES DISTRICT COURT**  
10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,  
12 Plaintiff,  
13 v.  
14 LEONARD JAMES SHOVE,  
15 Defendant.

Case No. 2:05-cr-00416-JCM-BNW

**STIPULATION TO CONTINUE  
REVOCATION HEARING**  
(Seventh Request)

17 IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson,  
18 United States Attorney, and Jean Ripley , Assistant United States Attorney, counsel for the  
19 United States of America, and Rene L. Valladares, Federal Public Defender, and Aden Kahssai,  
20 Assistant Federal Public Defender, counsel for Leonard James Shove, that the Revocation  
21 Hearing currently scheduled on January 3, 2025, be vacated and continued to a date and time  
22 convenient to the Court, but no sooner than one hundred twenty (120) days.

23 This Stipulation is entered into for the following reasons:

24 1. The defendant has been charged in an Indictment with conduct related to the  
25 underlying revocation petition.<sup>1</sup> Trial in the new case is scheduled for April 7, 2025.

26  

---

<sup>1</sup> Case No. 2:23-cr-00195-CDS-BNW

1           2.       In the new case, the parties are in the process of filing objections to the  
2 Magistrate Judge's report and recommendation as to Mr. Shove's Motion to Suppress. The  
3 parties need additional time to see the resolution of those objections by the District Court.

4           3.       The parties need additional time to see the resolution of the new case before  
5 proceeding with the revocation hearing in this case.

6           4.       Defendant is incarcerated and consents to a continuance.

7           5.       Additionally, denial of this request for continuance could result in a  
8 miscarriage of justice.

9           This is the seventh request for continuance filed herein.

10          DATED this 30<sup>th</sup> day of December, 2024.

11  
12          RENE L. VALLADARES  
13          Federal Public Defender

            JASON M. FRIERSON  
            United States Attorney

14          By /s/ Aden Kahssai

            By /s/ Jean Ripley

15          ADEN KAHSSAI  
16          Assistant Federal Public Defender

            JEAN RIPLEY  
            Assistant United States Attorney

1 UNITED STATES DISTRICT COURT

2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 LEONARD JAMES SHOVE,

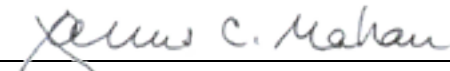
7 Defendant.

Case No. 2:05-cr-00416-JCM-BNW

**ORDER**

9  
10 Based on the Stipulation of counsel and good cause appearing,  
11 IT IS THEREFORE ORDERED that the Revocation Hearing currently scheduled on  
12 January 3, 2025 at the hour of 10:00 a.m., be vacated and continued to May 5, 2025 at the  
13 hour of 10:00 a.m.

14 DATED December 30, 2024.

15  
16   
17 UNITED STATES DISTRICT JUDGE